IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

MOTOROLA, INC.,

Case No. 1:08-cv-05427

Plaintiff,

Judge Matthew F. Kennelly Magistrate-Judge Geraldine Soat Brown

v.

LEMKO CORPORATION, XIAOHONG SHENG, SHAOWEI PAN, HANJUAN JIN, XIAOHUA WU, XUEFENG BAI, NICHOLAS LABUN, BOHDAN PYSKIR, HECHUN CAI, JINZHONG ZHANG, ANGEL FAVILA, ANKUR SAXENA, RAYMOND HOWELL, FAYE VORICK and NICHOLAS DESAI,

Defendants.

LEMKO CORPORATION, SHAOWEI PAN, XIAOHUA WU and XIAOHONG SHENG,

Counter-Plaintiffs,

v.

MOTOROLA, INC.,

Counter-Defendant.

NOTICE OF MOTION

PLEASE TAKE NOTICE THAT on Wednesday, November 23, 2011 at 9:30 a.m., Defendant Lemko Corporation shall appear before Judge Matthew F. Kennelly in courtroom 2103 and present its *Motion to Compel the Production of Documents Identified on Motorola's Privilege Log*, a copy of which is filed and served herewith.

Respectfully submitted,

/s/ Robert A. Conley

Raymond P. Niro Raymond P. Niro, Jr. Robert A. Conley Brian E. Haan Joseph A. Culig NIRO, HALLER & NIRO 181 W. Madison, Suite 4600 Chicago, IL 60602 (312) 236-0733

Fax: (312) 236-3137

<u>RNiro@nshn.com;</u> <u>RNiroJr@nshn.com;</u> <u>RConley@nshn.com;</u> <u>BHann@nshn.com;</u>

JCulig@nshn.com

Attorneys for Lemko Corporation, Shaowei Pan, Xuefeng Bai, Nicholas Labun, Bohdan Pyskir, Hechun Cai, Jinzhong Zhang, Ankur Saxena, Faye Vorick and Nicholas Desai Case: 1:08-cv-05427 Document #: 865 Filed: 11/17/11 Page 3 of 3 PageID #:24699

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 17, 2011 the foregoing

NOTICE OF MOTION

was filed with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the following counsel of record.

Counsel for Motorola

Dan K. Webb R. Mark Halligan John A. Chatowski James E. McComb Deanna R. Swits Robert A. Weikert Joanna R. Travalini Jason T. Kunze NIXON PEABODY LLP

Lawrence R. Desideri Jodi R. Wine One Embarcadero Center, 18th Floor

Maureen L. Rurka Michael C. Hallerud San Francisco, CA 94111 NIXON PEABODY LLP jchatowski@nixonpeabody.com WINSTON & STRAWN LLP rweikert@nixonpeabody.com 35 West Wacker Drive 300 South Riverside Plaza, 16th Floor

Chicago, IL 60601-9703 Chicago, IL 60606

dwebb@winston.com rhalligan@nixonpeabody.com emccomb@winston.com dswits@nixonpeabody.com jtravalini@winston.com jkunze@nixonpeabody.com ldesideri@winston.com jwine@nixonpeabody.com mrurka@winston.com hallerud@nixonpeabody.com

Counsel for Xiaohong Sheng

Thomas Howard Geoghegan Telly Stefaneas Michael Paul Persoon TELLY STEFANEAS, ESQ.

DESPRES SCHWARTZ & GEOGHEGAN 53 West Jackson Boulevard - Suite 1437

77 West Washington Street - Suite 711 Chicago, IL 60604 telly stefaneas@me.com

Chicago IL 60602 admin@dsgchicago.com mike.persoon@gmail.com

Counsel for Xiaohua Wu

Counsel for Angel Favila Karen Beverly William J. Leonard WANG, LEONARD & CONDON ADAMSKI & CONTI

33 North LaSalle Street - - Suite 2020 100 North LaSalle Street - Suite 1720

Chicago, IL 60602 Chicago, IL 60602

williamileonard@yahoo.com

Counsel for Raymond Howell

Isabella I Wells LAW OFFICES OF ISABELLA I. WELLS, P.C. 415 N. LaSalle - Suite 301 Chicago, IL 60654 isabellawells@gmail.com

I certify that all parties in this case are represented by counsel who are CM/ECF participants.

/s/ Robert A. Conley

KBeverly@adamskiandconti.com

Counsel for Hanjuan Jin

NIRO, HALLER & NIRO